



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LAWRENCE WATSON,

Plaintiff,

-against-

POLICE OFFICER JOSEPH MCGOVERN; POLICE
OFFICER ROMAN ILUSTRE; and POLICE OFFICER
JOHN DOE #3,

Defendants.

**STIPULATION OF
SETTLEMENT OF
ATTORNEYS' FEES**

10 Civ. 8018 (GBD) (KNF)

WHEREAS, plaintiff commenced this action by filing a complaint on or about October 19, 2010, alleging that the defendants violated plaintiff's federal civil and state common law rights; and

WHEREAS, defendants Officer Joseph McGovern and Officer Roman Ilustre have denied any and all liability arising out of plaintiff's allegations; and

WHEREAS, the parties entered into a settlement agreement to settle this case for \$30,001.00 plus reasonable attorneys' fees, costs, and expenses, up to May 8, 2012; and

WHEREAS, the parties now desire to resolve the issue of attorneys' fees, costs and expenses, without further proceedings; and

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, the attorneys of record for the respective parties to the above-captioned action, as follows:

1. The City of New York shall pay to plaintiff's counsel, Wilmer Cutler Pickering Hale and Dorr LLP, the sum total of TEN THOUSAND DOLLARS (\$10,000.00) in full satisfaction of plaintiff's attorneys' fees, expenses and costs; and

2. This Stipulation of Settlement of Attorneys' fees ("Stipulation") shall not be construed to be an admission by any of the defendants that they have in any manner or way violated plaintiff's rights, or the rights of any other person or entity, as defined in the constitutions, statutes, ordinances, rules or regulations of the United States, the State of New York, or the City of New York or any other rules, regulations or bylaws of any department or subdivision of the City of New York; and

3. This Stipulation shall not be admissible in, nor is it related to, any other litigation or settlement negotiations, and nothing contained herein shall be deemed to constitute a policy or practice of the City of New York.

Dated: New York, New York
June 25, 2012

Wilmer Cutler Pickering Hale and Dorr LLP
Attorneys for Plaintiff
399 Park Avenue
New York, NY 10022
(212) 295-6537

By: Seth M. Jesse
Seth M. Jesse, Esq.
Attorney for Plaintiff

JUN 25 2012

Dated: New York, New York
2012

MICHAEL A. CARDOZO
Corporation Counsel of the
City of New York
Attorney for Defendants McGovern and
Ilustre
100 Church Street, Rm.
New York, New York 10007

By:

Steven M. Silverberg
Steven M. Silverberg
Assistant Corporation Counsel

SO ORDERED:

George B. Daniels
HON. GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE
HON. GEORGE B. DANIELS